

**THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR,
et al.,

Plaintiffs,

vs.

PREFERRED CREDIT CORPORATION,
et al.,

Defendants.

Case No. 4:10-cv-00189-ODS

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
SUGGESTIONS IN OPPOSITION TO
DEFENDANTS' SEPARATE MOTIONS TO EXCLUDE AND MOTIONS IN LIMINE**

Plaintiffs respectfully move the Court for an extension of time to September 27, 2012 in which to file their suggestions in opposition to the following separate motions to exclude, motions in limine and/or motion to strike:

(1) Motion to Exclude Testimony of Dr. Kurt V. Krueger Under Fed.R.Evid. 702 by Defendant Deutsche Bank National Trust Company, as Indenture Trustee for the Impact Trusts' Bonds (Doc. 668 & 669);

(2) Daubert Motion of Defendants Litton Loan Servicing L.P. and JPMorgan Chase Bank, National Association, as Former Trustee, to Exclude Expert Testimony (Doc. 687 & 689);

(3) Defendant Wendover Financial Services Corporation's Motion to Exclude Expert Testimony (Doc. 695);

(4) Daubert Motion of Defendant Wilmington Trust Company to Exclude Expert Testimony (Doc. 681);

(5) Defendants' Joinder in Motions of Defendants Deutsche Bank National Trust Company, Litton Loan Servicing L.P., and J.P. Morgan Chase Bank to Exclude the Opinions and Testimony of Dr. Kurt V. Krueger (Doc. 694);

(6) Motion in Limine to Exclude the Opinions and Testimony of Dr. John O. Ward (Doc. 698 & 699);

(7) Motion in Limine to Exclude the Opinions and Testimony of Rebecca Walzak (Doc. 700 & 701); and

(8) Motion to Strike Opinions and Testimony Set Forth in the Supplemental Report of Dr. John O. Ward (Doc. 696 & 697). In support of this motion, Plaintiffs state as follows:

1. On August 27, 2012, various defendants filed eight (8) separate Motions to Exclude and suggestions in support thereof. (Doc. 668, 681, 687, 694, 695, 696, 698, 700). The motions for and/or suggestions in support of the eight (8) separate motions total sixty-seven (67) pages collectively.

2. Plaintiffs' suggestions in opposition to the eight (8) separate motions to exclude, motions in limine and/or motion to strike are currently due on September 13.

3. Due to the size of the eight (8) separate motions to exclude, motions in limine and/or motion to strike, Plaintiffs preparation of suggestions in opposition to nine (9) separate motions for summary judgment, suggestions in support and statement of facts which contain collectively 214 pages, currently due on September 20, 2012, Plaintiffs continued preparation for trial in this case, and the press of other business that has effectively precluded counsel from completing the work they need to do to prepare and file their suggestions in opposition, Plaintiffs need additional time up through and including September 27, 2012, in which to file their oppositions to the eight (8) separate motions to exclude, motions in limine and motion to strike.

4. Plaintiffs have contacted counsel for the various moving defendants, all of whom have indicated that they do not oppose the requested extension of time.

5. This request is made in good faith, is not for purposes of delay, and will not prejudice any party. Further, the request will not adversely affect any deadlines in this case.

WHEREFORE, Plaintiffs respectfully request the Court to enter an Order granting them an extension of time to September 27, 2012 in which to file their suggestions in opposition to the following separate motions to exclude, motions in limine and motion to strike:

(1) Motion to Exclude Testimony of Dr. Kurt V. Krueger Under Fed.R.Evid. 702 by Defendant Deutsche Bank National Trust Company, as Indenture Trustee for the Impact Trusts' Bonds (Doc. 668 & 669);

(2) Daubert Motion of Defendants Litton Loan Servicing L.P. and JPMorgan Chase Bank, National Association, as Former Trustee, to Exclude Expert Testimony (Doc. 687 & 689);

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(6) Motion in Limine to Exclude the Opinions and Testimony of Dr. John O. Ward (Doc. 698 & 699);

(7) Motion in Limine to Exclude the Opinions and Testimony of Rebecca Walzak (Doc. 700 & 701); and

(8) Motion to Strike Opinions and Testimony Set Forth in the Supplemental Report of Dr. John O. Ward (Doc. 696 & 697). and for any other relief the Court deems just and proper.

Dated: September 13, 2012

Respectfully submitted,

WALTERS BENDER STROHBEHN
& VAUGHAN, P.C.

By: /s/ R. Frederick Walters

R. Frederick Walters – Mo. Bar 25069

Kip D. Richards – Mo. Bar 39743

David M. Skeens – Mo. Bar 35728

Karen W. Renwick – Mo. Bar 41271

J. Michael Vaughan Mo. – Bar 24989

Garrett M. Hodes – Mo. Bar 50221

Matthew R. Crimmins – Mo. Bar 53138

Bruce V. Nguyen – Mo. Bar 52893

2500 City Center Square

1100 Main Street

P.O. Box 26188

Kansas City, MO 64196

(816) 421-6620

(816) 421-4747 (Facsimile)

fwalters@wbsvlaw.com

krichards@wbsvlaw.com

dskeens@wbsvlaw.com

krenwick@wbsvlaw.com

mvaughan@wbsvlaw.com

ghodes@wbsvlaw.com

mcrimmins@wbsvlaw.com

bnguyen@wbsvlaw.com

**ATTORNEYS FOR PLAINTIFFS
AND CLASS COUNSEL**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 13th day of September 2012, I electronically filed the above and foregoing document with the Clerk of Court of the Western District of Missouri using the Court's ECF system, which will send notification of said filing to all counsel of record who are ECF participants. In addition, a copy was served by U.S. mail, First-Class Postage Prepaid, to:

Arthur E. Kechijian, Manager
United Mortgage C.B., LLC
P.O. Box 471827
Charlotte, NC 28247
Defendant United Mortgage C.B., L.L.C.

/s/ R. Frederick Walters